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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff;

vs.

ERICA M. BALDA, et. al.,

Defendants.

CASE NO.: 2:16-cr-00349-RFB

**STIPULATION TO EXTEND DEADLINE
FOR REPLY IN SUPPORT OF MOTION
TO SUPPRESS AND PROPOSED ORDER**

(First request)

IT IS HEREBY STIPULATED AND AGREED, by and between Jared Grimmer, Assistant United States Attorney, counsel for the United States of America, and Kathleen Bliss, Esq., counsel for defendant Erica Balda, that the deadline in which Ms. Balda must file her reply brief in support of her motion to suppress (ECF No. 35) currently due April 14, 2017, be extend by seven (7) days to and including April 21, 2017. This stipulation is entered into for the following reasons:

1. The defendant is in custody but does not oppose the continuance.
2. The parties agree to the continuance.
3. The additional time requested herein is not sought for purposes of delay.
4. Counsel for defendant requires additional time to prepare the reply, taking into account the exercise of due diligence.
5. Denial of this request for continuance could result in a miscarriage of justice.

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6. This is the first stipulation to extend the reply date request in this case. Trial is set for July 11, 2017, thus it is submitted that the short extension requested herein will not impact the trial date.

Dated this 12th day of April 2017.

/s/ Kathleen Bliss
KATHLEEN BLISS, ESQ.
Counsel for defendant Erica Balda

/s/ Jared Grimmer
JARED GRIMMER
Assistant United States Attorney
Counsel for the United States

ORDER

Based upon the stipulation of counsel, and with good cause appearing, IT IS HEREBY ORDERED that defendant's reply brief in support of her motion to suppress (ECF No. 35) currently due April 14, 2017, be extended by seven (7) days to, and including, April 21, 2017.

DATED this 13th day of April 2017.



HONORABLE RICHARD F. BOULWARE II
UNITED STATES DISTRICT JUDGE